

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SCOTTSDALE INSURANCE COMPANY, as
successor in interest to WESTERN HERITAGE
INSURANCE COMPANY,

Plaintiff,

vs.

ZOLO SERVICES CORP. and
QUALITY BUILDING CONSTRUCTION LLC,

Defendants.

**NOTICE OF MOTION FOR
DEFAULT JUDGMENT**

Civil Action No.: 1:22-CV-02313

PLEASE TAKE NOTICE that, upon the accompanying Declaration of Jonathan Schapp, Esq., and its exhibits, Declaration of Pam Downey-Stralser and the accompanying Memorandum of Law, Plaintiff SCOTTSDALE INSURANCE COMPANY, as successor in interest to WESTERN HERITAGE INSURANCE COMPANY, by their attorneys, Goldberg Segalla, LLP, will move this Court **VIA A TELEPHONIC APPEARANCE** at the United States District Court, Southern District of New York, 500 Pearl Street, New York, New York 10007, before the Hon. Lewis J. Liman, United States District Judge, at a DEFAULT JUDGMENT HEARING, scheduled to proceed **TELEPHONICALLY** on **October 27, 2022** at **12:00 p.m.** the parties are directed to dial in the Court's teleconference number at **888-251-2909**, Access Code **2123101**, and follow the prompts, so as to appear for the Default Judgment Hearing for an Order pursuant to Rule 55(b)(2) of the Federal Rules of Civil Procedure, Rule 55.2 of the Local Rules of the United States District Court of the Southern District of New York, and Rule E5 of Judge Lewis J. Liman's Individual Practices and Procedures, granting a default judgment in Plaintiff's favor against Zolo

Services Corp. (“Zolo”) on the grounds that said defendant failed to answer or otherwise defend against the complaint.

THE ATTACHED LEGAL PAPERS ARE BEING SERVED ON YOU BECAUSE YOU HAVE FAILED TO APPEAR IN A LAWSUIT BROUGHT AGAINST YOU. IF YOU DO NOT ENTER AN APPEARANCE IN THE LAWSUIT ON OR BEFORE OCTOBER 27, THE COURT WILL ENTER A DEFAULT JUDGMENT AGAINST YOU. IF YOU ARE A CORPORATION, YOU CAN ONLY APPEAR THROUGH AN ATTORNEY. IF YOU ARE AN INDIVIDUAL, YOU MAY APPEAR BY AN ATTORNEY OR PRO SE. IN EITHER EVENT, YOU MUST TAKE SOME ACTION OR A JUDGMENT WILL BE ENTERED AGAINST YOU. ENTRY OF A JUDGMENT MAY RESULT IN A LEVY AGAINST YOUR PROPERTY.

Dated: October 19, 2022
Buffalo, New York

GOLDBERG SEGALLA LLP

s/Jonathan Schapp

By

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TO: **Zolo Service Corp.**
Via Secretary of State
One Commerce Plaza
99 Washington Avenue
Albany, New York 12231

& Jaime Grisales
8820 Whitney Ave, Suite 4B
Elmhurst, New York 11373